

ORIGINAL

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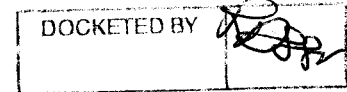
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Arizona Corporation Commission
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MAR 14 2012

RE: ACC Docket No. E-00000C-11-0328

Subj: Comments on Smart Meter Guidelines



Ref: Your letter of 24 February 2012

1. The implementation of new and smart meter technology, its software and analysis capabilities are the most innovative and cost effective processes now involving the entire energy and associated resources industries. The continual improvements this smart meter and associated grid and energy management capabilities must NOT be restricted by premature short-term regulations and rules. Your ongoing effort to review this situation is important because both privacy and security always remain important for individuals and various entities in our state.
2. Your letter implies that customer "op-out" should be allowed for customers to NOT have smart meters installed. Unfortunately, such an "op-out" option will have serious implementation complications and costs and can easily nullify many of the benefits of smart meter technology. In my view, as this technology matures, some initial and *temporary* customer "op-out" might be considered as both privacy and security technologies are being proven. Ultimately, when the Commission is confident, then ALL customers must be included to achieve the benefits necessary for the good of the public.
3. Attached are specific comments on each of the draft "meter guidelines".
4. Answers to the four questions posed in the referent letter follow:
 1. I am not a utility company. My observation indicates they are not being implemented.
 2. As modified herein.
 3. At present, all utilities have been **unsatisfactory** in public education concerning smart meters and mostly misconceptions are repeated in letters to editors and talk radio shows. **A proactive and aggressive information program is needed statewide.**
 4. Long-term plans, in particular, statewide data integration needs to be implemented for ALL UTILITIES at the Commission-level. The same process should be implemented for **all utilities** including electric, water, wastewater, natural gas, and communications.

Respectfully submitted,

Marshall Magruder
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Draft Meter Guidelines for all Utilities
(by Marshall Magruder)

These guidelines should be the same for ALL utilities in the state, not just electric.

1. Measurement ~~will~~shall not be specific to any particular appliance or electrical device, unless approved by the Commission for a specific tariff.
2. The utility ~~will~~shall not share energy usage data except with its authorized agent. Individual or aggregate usage data will never be sold.
3. All information transmitted between meters and the utility and between the customer and the utility ~~must~~shall be encrypted and also be password protected using US government approved and recommended standards.
4. Data from each meter ~~must~~shall use specific unique identifiers associated with the customer's meter number and service address to ensure that each customer is billed for his/her own usage.
5. The utility ~~must~~shall not control or shut off individual appliances without customer consent based on an approved ACC tariff.
6. The utility ~~may~~shall shut off utility electric service per ACC rules. The utility will abide by current regulations with respect to shut-off of service and curtailment in power emergencies.
7. The utility will limit the length of data transmission over a 24-hour period, ~~(utility input will help define the appropriate length of time in seconds or minutes per time period).~~ [This is clear without specific lengths of time and will change as technology matures.]
8. Individual usage data gathered ~~will~~shall be available only to the customer, the utility, and its duly authorized agent. Such data ~~may~~can be used ~~only~~ to help the customer make choices that will help keep electric bills to a minimum and for the utility to plan, operate and maintain continuity of cost-effective service for its customers. [This is too restrictive, as such data are very important for the utility to plan, operate and maintain its resources.]
9. The utility ~~will~~shall, in general, use ~~only~~ aggregate, anonymous data for system planning, operations and maintenance purposes. [A more realistic statement.]
10. Utility-wide aggregate data by customer rate categories and classes can be made public and may used in rate cases. [New]
- 9.11. The Commission will establish a statewide aggregate-data integration plan for each type of utility. [New]